

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO.	
v.	:	DATE FILED:	
HALEEMAH GRIFFIN	:	VIOLATIONS:	18 U.S.C. § 371 (Conspiracy to commit armed bank robbery - 1 Count)
	:		
	:		18 U.S.C. § 2113(d) (Armed bank robbery - 1 Count)
	:		18 U.S.C. § 2 (Aiding and Abetting - 1 Count)

I N D I C T M E N T

COUNT ONE

THE GRAND JURY CHARGES THAT:

1. From in or about December 2001 to on or about January 10, 2002, in the Eastern District of Pennsylvania and elsewhere, defendant

HALEEMAH GRIFFIN

conspired and agreed, together and with others known and unknown to the grand jury, to commit an offense against the United States, that is, armed bank robbery, in violation of Title 18, United States Code, Section 2113(d).

MANNER AND MEANS

2. It was part of the conspiracy that Edward Nelson, charged elsewhere, planned to rob the Sovereign Bank (hereafter "the Bank"), 8319 Stenton Avenue, Philadelphia, Pennsylvania. Nelson requested the assistance of defendant HALEEMAH GRIFFIN to commit the bank robbery.

3. It was further part of the conspiracy that Edward Nelson and another person known to the grand jury would rob the Bank using handguns in order to steal approximately \$13,696 from the Bank.

4. It was further part of the conspiracy that the defendant HALEEMAH GRIFFIN conducted surveillance inside the Bank before the robbery began.

OVERT ACTS

In furtherance of the conspiracy, defendant HALEEMAH GRIFFIN, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

1. On January 10, 2002, at the instruction of Edward Nelson, defendant HALEEMAH GRIFFIN drove Nelson and another co-conspirator known to the grand jury to the Bank in GRIFFIN'S car, a bluish-colored Geo Prism.

2. On January 10, 2002, at the direction of Edward Nelson, defendant HALEEMAH GRIFFIN entered the Bank to conduct surveillance and confirm whether the bank manager was in the bank at that time.

3. After confirming the bank manager was inside the Bank, defendant HALEEMAH GRIFFIN signaled to Edward Nelson and the other person known to the grand

jury, who then entered the bank to commit the armed bank robbery. The robbery was committed at gun point and approximately \$13,696 was taken from the Bank.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 10, 2002, in the Eastern District of Pennsylvania, defendant

HALEEMAH GRIFFIN

knowingly and unlawfully, by force and violence, and by intimidation, took from, and aided and abetted in the taking from, employees of the Sovereign Bank, 8319 Stenton Avenue, Philadelphia, Pennsylvania (hereafter “the Bank”), lawful currency of the United States, that is, approximately \$13,696, belonging to, and in the care, custody, control, management and possession of the Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, defendant HALEEMAH GRIFFIN knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Bank, and other persons, by use of dangerous weapons, that is, two firearms.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney

